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SAFEWAY INC. and SAFEWAY BENEFIT
13 PLANS COMMITTEE

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO
17

18 DENNIS M. LORENZ, Individually and On
Behalf of All Others Similarly Situated,

19 Plaintiff,

20 vs.

21 SAFEWAY, INC.; SAFEWAY BENEFIT
22 PLANS COMMITTEE; GREAT-WEST
FINANCIAL RPS LLC; and DOES 1 through
23 50, inclusive,

24 Defendants.
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Case No. 3:16-cv-04903-JST

**STIPULATION FOR AN ORDER
CONTINUING CASE MANAGEMENT
CONFERENCE TO OCTOBER 11, 2017**

Pursuant to Local Rule 6-1(b), Defendants SAFEWAY INC. and SAFEWAY BENEFIT PLANS COMMITTEE (collectively, “Safeway Defendants”) and Plaintiff DENNIS M. LORENZ (“Plaintiff”) (Plaintiff and Safeway Defendants collectively referred to as the “Parties”) hereby stipulate and request, by and through their respective counsel, an order continuing the further case management conference that is currently set in this litigation to October 11, 2017 at 2:00 p.m.:

WHEREAS, a further case management conference is currently set in this action for September 13, 2017 at 2:00 p.m., with an updated joint case management statement due by September 5, 2017 (Docket No. 61);

WHEREAS, this case was deemed “related” to another case currently pending before the Court, titled *Maria Karla Terraza v. Safeway Inc., et al.* (No. 16-cv-03994-JST) (Docket No. 26);

WHEREAS, a further case management conference was previously set in the *Maria Karla Terraza* action for September 13, 2017 (Case No. 16-cv-03994 Docket No. 66);

WHEREAS, on August 25, 2017, the Clerk issued a notice continuing the case management conference in the *Maria Karla Terraza* case to October 11, 2017 at 2:00 p.m., with an updated joint case management statement due by October 2, 2017 (Case No. 16-cv-03994 Docket No. 91);

WHEREAS, the Parties have agreed that good cause exists for an order continuing the further case management conference currently set in this case, to the October 11, 2017 at 2:00 p.m. continued date set in the *Terraza* action because issues may be addressed at both conferences that affect both of these related cases, and that an updated joint case management statement will be due in this action by October 2, 2017 accordingly;

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1 NOW, THEREFORE, the Parties hereby stipulate and request as follows:

- 2 1. That the Court issue an order continuing the further case management conference
3 currently set in this action to the October 11, 2017 at 2:00 p.m., and that an updated
4 joint case management statement will be due by October 2, 2017.

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6 IT IS SO STIPULATED.

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8 DATED: August 30, 2017

TRUCKER ♦ HUSS

9 By: /s/ Joseph C. Faucher

10 R. Bradford Huss

Joseph C. Faucher

11 Attorneys for Defendants

12 SAFEWAY INC. and SAFEWAY BENEFIT
PLANS COMMITTEE

13 DATED: August 30, 2017

SCHNEIDER, WALLACE, COTTRELL, KONECKY,
14 WOTKYNs, LLP

15 By: /s/ Kyle G. Bates

16 Jason H. Kim

Kyle G. Bates

17 Attorneys for Plaintiff

DENNIS M. LORENZ, individually and on behalf
18 of the SAFEWAY 401(K) PLAN

19 I attest that my firm has obtained Kyle G. Bates's concurrence in the filing of this document.

20
21 DATED: August 30, 2017

22 TRUCKER ♦ HUSS

23 By: /s/ Joseph C. Faucher

24 R. Bradford Huss

Joseph C. Faucher


25 Attorneys for Defendants

26 SAFEWAY INC. and BENEFIT PLANS
COMMITTEE SAFEWAY INC.

~~PROPOSED~~ ORDER

Good cause exists for an order continuing the further case management conference currently set in this action for September 13, 2017. The further case management conference is hereby continued to October 11, 2017 at 2:00 p.m. An updated joint case management statement is due by October 2, 2017.

DATE: August 30, 2017



Hon. Jon S. Tigar
United States District Court Judge